

The Honorable Ricardo S. Martinez

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,
Plaintiff,
v.
TRAVIS JASON NAVARRO,
Defendant.

NO. CR21-210 RSM

**SECOND DISCOVERY PROTECTIVE
ORDER**

This matter, having come to the Court's attention on the Stipulation for Entry of a Discovery Protective Order submitted by the United States of America and Defendant Travis Jason Navarro, and the Court, having considered the stipulated motion, and being fully advised in this matter, hereby enters the following SECOND PROTECTIVE ORDER:

1. Protected Material

The following are deemed Protected Material: records provided by the State of Washington: Child Protective Services and the Sauk-Suiattle Indian Tribe pertaining to child welfare investigations and dependency proceedings regarding the welfare of Jane Doe and other minors. The United States will make available copies of the Protected Material, including those filed under seal, to defense counsel to comply with the government's discovery obligations. Possession of copies of the Protected Material is limited to the attorneys of record, and

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2 investigators, paralegals, law clerks, experts, and assistants for the attorneys of record
3 (hereinafter collectively referred to as members of the defense team).

4 2. Scope of Review of Protected Material

5 Defense attorneys of record and members of the defense team may display and
6 review the Protected Material with the Defendant. The attorneys of record and members
7 of the defense team acknowledge that providing copies of the Protected Material to the
8 Defendant and other persons is prohibited, and agree not to duplicate or provide copies of
9 Protected Material to the Defendant and other persons

10 3. Consent to Terms of Protective Order

11 The attorneys of record for the Defendant are required, prior to disseminating any
12 copies of the Protected Material to permitted recipients, such as other members of the
13 defense team, to provide a copy of this Protective Order to those permitted recipients, and
14 to obtain the written consent by those recipients of the terms and conditions of this
15 Protective Order. Such written consent shall not, however, be required with respect to
16 members of the defense team who are employed by the same office as the attorneys of
17 record; in such case, it shall be sufficient for the attorneys of record to provide a copy of
18 this Protective Order to such other members of the defense team and to remind them of
19 their obligations under the Order. The written consent need not be disclosed or produced
20 to the United States unless requested by the United States Attorney's Office for the
21 Western District of Washington and ordered by the Court.

22 4. Parties' Reciprocal Discovery Obligations

23 Nothing in this order should be construed as imposing any discovery obligations
24 on the government or the defendant that are different from those imposed by case law and
25 Rule 16 of the Federal Rules of Criminal Procedure, and the Local Criminal Rules.

26 5. Filing of Protected Material

27 Any Protected Material that is filed with the Court in connection with pre-trial
28 motions, trial, sentencing, or other matter before this Court, shall be filed under seal and

1 shall remain sealed until otherwise ordered by this Court. This does not entitle either
2 party to seal their filings as a matter of course. The parties are required to comply in all
3 respects to the relevant local and federal rules of criminal procedure pertaining to the
4 sealing of court documents.

5 6. Nontermination

6 The provisions of this Order shall not terminate at the conclusion of this
7 prosecution. The provisions of this Order shall terminate only by court order.

8 7. Violation of Protective Order

9 The defendant is on notice that should he violate the terms of this protection order,
10 the United States reserves the right to seek appropriate relief from the Court.

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13 DATED this 26th day of August, 2022.

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16 RICARDO S. MARTINEZ
17 CHIEF UNITED STATES DISTRICT JUDGE

18 Presented by:

19
20 /s/ Rebecca S. Cohen

21 REBECCA S. COHEN
22 Assistant United States Attorney

23
24 /s/ Rebecca Fish

25 REBECCA FISH
26 Attorney for Defendant
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